

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.**

In the Matter of:	)	
	)	
Request for Waiver	)	
	)	CC Docket No. 02-6
by	)	
	)	
Westmont Hilltop School District	)	
Johnstown PA	)	

TO: Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

For Erate Funding Year 2019 (“FY2019”) Westmont Hilltop School District (“WHSD”), filed its Category 1 (“C1”) FCC Form 471 before the deadline, however its FCC Form 471 Application, #191032565 for Category 2 (“C2”) Internal Connections was filed fourteen (14) days after the deadline.

WHSD respectfully requests that, pursuant to 54.719 through 54.723 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,<sup>1</sup> the Commission grant it a Waiver of the FY2019 Form 471 filing deadline so that Application #191032565 may be considered for funding as though timely filed.

<b>Applicant Information:</b>	Billed Entity Number:	125431
	FCC Form 471 Application Number:	191032565

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<sup>1</sup> 47 C.F.R. §§ 54.719–54.723

**Contact Information:**

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**STATEMENT IN SUPPORT OF WAIVER**

Since the C1 services for which WHSD timely applied in FY2019 did not require the posting of a FCC Form 470, WHSD did not realize the importance of certifying the FCC Form 470 for its Internal Connections project on or before 02-27-2019. The result of the misunderstanding was that FCC Form 470 #190021271 wasn't certified until 03-13-2019.

Unfortunately, needing to be in compliance with the 28-day waiting period before conducting an evaluation and entering into a legally binding agreement meant missing the FY2019 Form 471 deadline of 03-27-2019. Once the allowable contract date of 04-10-2019 was reached, WHSD conducted an evaluation, went through its vendor selection process and finalized and signed a contract with Sun Management, Inc.; FCC Form 471 #191032565 was filed that same date.

The Commission has repeatedly reiterated its authority under 47 C.F.R. §1.3 to waive rules for good cause shown and for the past number of years has customarily waived the filing deadline for late filed Forms 471 that were filed within 14 days of the close of the Window. See, Requests For Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science et al CC Docket No. 02-6, Order 25FCC Rcd 9256,9259, para 8 (2010) and more recently, Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company, Dated

April 30, 2019, at footnote 16. Moreover, a waiver of the FY2019 filing deadline would have no adverse effect on the effective administration of the E-rate program.

In keeping with recent precedence, WHSD respectfully requests the Commission grant it a Waiver of the FY2019 filing deadline and allow FCC Form 471 #191032565 considered for funding as though timely filed within the Window since it was filed 14 days after the filing window deadline.

Thank you for your consideration.

Respectfully submitted,

/s/ Linda Schreckinger Sadler

On behalf of Educational Funding Group, Inc.